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Don Chambers

S. REX LEWIS, for:
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15 Aug 1980

Defendants
Attorneys for _____

IN THE FOURTH JUDICIAL DISTRICT COURT OF WASATCH COUNTY
STATE OF UTAH

TOWN OF SOLDIER SUMMIT, :
Plaintiff, : ANSWERS TO INTERROGATORIES
vs. :
ROGER N. ANDERSON, et al., : Civil No. 5507
Defendants. :
_____ :

COMES now the defendant, Ruth Rhinehart, and answers the
Interrogatories of the plaintiff as follows:

1. Do you have any knowledge or information concerning the
location of any of the personal property described in paragraph 3
and paragraph 6 of the amended complaint?

ANSWER: Permission was given by the town council that
the radar gun, police radio, citizens band base, citizens band
radio and police guns were to be sold to pay the town debts. The
water pump and water tools and 38 revolver - we have possession of
said property. We kept them and stated that they would be turned
over to the town as soon as we were sure that Mr. Chambers was the
mayor. We would turn them over to the town. The badges were left
in the police car. The town seal and miscellaneous papers, records,
and accounts were left in the motel, to the best of my knowledge.

First-aid kit - Ken Pruitt
Flash light - Ken Pruitt
Cables - left in police car
Filing cabinets - Roger Anderson
Badges - left in police car
Pistol - Ruth Rhinehart
Realistic CB - Ruth Rhinehart
Radar gun - Ken Pruitt
Police Radio - Roger Anderson

15 Aug 1980

1 Base Radio - Tom Brackenbury
2 Antenna - left on police car
3 Snowtires - worn out
4 Regular tires - on police car
5 Police lights - worn out
6 Emblems - put on police car and window of City Hall
7 Court supplies - used
8 Police supplies - used and some were left at the motel in
9 Soldier Summit.

10 The ordinance books were never returned from Mr. Chambers
11 after he resigned. The ticket books, receipt books and other
12 papers were never returned from the Attorney General's Office.
13 Some papers were turned over to Tom Hunsaker in July of 1979 by
14 Ruth Rhinehart. The town seal was left at the motel with the
15 rest of the stuff.

16 2. If so, state what the information is with respect to
17 each item of personal property.

18 ANSWER: See answer to Interrogatory No. 1.

19 3. Have you ever had possession or control of any of said
20 property?

21 ANSWER: See answer to Interrogatory No. 1.

22 4. If so, state: (a) The last time you had possession or
23 control of said property, listing each item of property and the
24 date of possession or control of the same. (b) Whether or not
25 said property is still in your possession. (c) If the property
26 is not in your possession, give the name and address of the person
27 to whom the property was delivered and the approximate date of
28 delivery.

29 ANSWER: See answer to Interrogatory No. 1.

30 5. Do you have in your possession any papers, minutes, or-
31 dinances, records, accounts, receipts, or other papers dealing
32 with any business or affairs of the Town of Soldier Summit or any
of its officers?

ANSWER: See answer to Interrogatory No. 1.

6. If so, state, for each such paper a description of the
same and where such item can be located.

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1 ANSWER: See answer to Interrogatory No. 1.

2 7. Do you have any knowledge concerning the whereabouts of
3 any papers, ordinances, records, accounts, receipts, minutes, or
4 other papers dealing with the Town of Soldier Summit?

5 ANSWER: See answer to Interrogatory No. 1.

6 8. If so, state what the information is, the source of such
7 information, and the names and addresses of any persons who might
8 have similar information concerning the whereabouts of said prop-
9 erty.

10 ANSWER: See answer to Interrogatory No. 1.

11 DATED this 15 day of August, 1980.

13 Ruth Rhinehart
14 RUTH RHINEHART
Defendant

15 STATE OF UTAH)
16 : ss.
16 COUNTY OF Carbon)

17 On the 15th day of ~~August~~ ^{September}, 1980, personally appeared before
18 me, a Notary Public in and for the above County and State, RUTH
19 RHINEHART, the signer of the foregoing Answers to Interrogatories,
20 who duly acknowledged to me that she executed the same.

21
22 Paul L. Morgan
23 NOTARY PUBLIC
24 My Commission Expires: 11-22-81
25 Residing at: Price, Utah

26 MAILED a copy of the foregoing Answers to Interrogatories to
27 James J. Smedley, Attorney for Plaintiff, 30 North Main, Heber
28 City, Utah 84032, this 24 day of ~~August~~ ^{Sept.}, 1980.

29
30 Deanna Wilson
31 SECRETARY
32

1 S. REX LEWIS, for:
 2 HOWARD, LEWIS & PETERSEN
 3 ATTORNEYS AND COUNSELORS AT LAW
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 6 PROVO, UTAH 84601
 7 TELEPHONE: 373-6345

16 Aug 1980

8 Defendants

9 Attorneys for _____

10 IN THE FOURTH JUDICIAL DISTRICT COURT OF WASATCH COUNTY
 11 STATE OF UTAH

12 TOWN OF SOLDIER SUMMIT, :

13 Plaintiff, :

14 ANSWERS TO INTERROGATORIES

15 vs.

16 ROGER N. ANDERSON, et al., :

17 Civil No. 5507

18 Defendants. :

19 COMES now the defendant, Roger N. Anderson, and answers the

20 Interrogatories of the plaintiff as follows:

21 1. Do you have any knowledge or information concerning the
 22 location of any of the personal property described in paragraph 3
 23 and paragraph 6 of the amended complaint?

24 ANSWER: Permission was given by the officials of Soldier
 25 Summit for the radar gun, police radio, citizens band base, citi-
 26 zens band auto, a 38 revolver, police gun and all other police
 27 property of the police department to be sold. These items were
 28 sold for police wages owed to the police officers. Other miscel-
 29 laneous city water tools, water pump, miscellaneous papers, ordin-
 30 ances, records, accounts and receipts and town seal, I have no
 31 knowledge of.

32 2. If so, state what the information is with respect to each
 item of personal property.

ANSWER: First aid kit - owner, Ken Pruitt.

Flash light - owner, Ken Pruitt.

Heavy duty jumper cables - left in police car at Soldier
 Summit.

1 and the approximate date of delivery.

2 ANSWER: See answers to Interrogatories Nos. 1 and 2.

3 (a) Dates are unknown, items were sold at different
4 times during the year 1979-1980.

5 (b) No.

6 (c) Some of the items were sold from out of the cafe in
7 Soldier Summit. Do not know names or places of persons who pur-
8 chased said items.

9 5. Do you have in your possession any papers, minutes,
10 ordinances, records, accounts, receipts, or other papers dealing
11 with any business or affairs of the Town of Soldier Summit or any
12 of its officers?

13 ANSWER: No.

14 6. If so, state, for each such paper, a description of the
15 same and where such item can be located.

16 ANSWER: See answer to Interrogatory No. 5.

17 7. Do you have any knowledge concerning the whereabouts of
18 any papers, ordinances, records, accounts, receipts, minutes, or
19 other papers dealing with the Town of Soldier Summit?

20 ANSWER: All papers that were in possession of Roger
21 Anderson were taken to the motel in Soldier Summit and stored
22 there. After being placed in said motel office I have no further
23 knowledge of the said items.

24 8. If so, state what the information is, the source of such
25 information and the names and addresses of any persons who might
26 have similar information concerning the whereabouts of said prop-
27 erty.

28 ANSWER: Contact the Attorney General's Office or the
29 Soldier Summit officials.

30 DATED this 16th day of August, 1980.

31
32
ROGER M. ANDERSON
Defendant

1 STATE OF UTAH)
2 : ss.
3 COUNTY OF UTAH)

4 On the 16th day of August, 1980, personally appeared before
5 me, a Notary Public in and for the above County and State, ROGER
6 N. ANDERSON, the signer of the foregoing Answers to Interrogator-
7 ies, who duly acknowledged to me that he executed the same.

8
9 My Commission Expires:

10
11 ~~APRIL 2-81~~

12
13 Residing at:

14
15 James J. Smedley, Attorney for Plaintiff, 30 North Main, Heber
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MAILED a copy of the foregoing Answers to Interrogatories to
James J. Smedley, Attorney for Plaintiff, 30 North Main, Heber
City, Utah 84032, this 19th day of August, 1980.

James J. Smedley
SECRETARY